



THE CITY OF NEW YORK
LAW DEPARTMENT

Hon. Sylvia O. Hinds-Radix
Corporation Counsel

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October 24, 2022

BY ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application GRANTED. City Defendants shall file a letter motion for approval of the redacted filing in accordance with Individual Rule I.D.3 by November 1, 2022. Dkt. No. 64-1 will remain under seal pending the resolution of the anticipated motion.

Dated: October 25, 2022
New York, New York.

A handwritten signature of Lorna G. Schofield in black ink.

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Jonathan Corbett v. Kathleen Hochul, et al., 22 CV 5867 (LGS)

Dear Judge Schofield:

I am an attorney in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. I submit this letter on behalf of Defendants Eric Adams, Mayor of the City of New York, Keechant Sewell, Commissioner of the New York City Police Department (“NYPD”), and NYPD Inspector Hugh Bogle, Commanding Officer of the NYPD License Division, all sued in their official capacity (collectively “City Defendants”), to seek permission under SDNY Electronic Case Filing Rules and Instructions Section 21.7 to place under seal a document previously filed by City Defendants.

On Friday, October 21, 2022, City Defendants filed their opposition papers to Plaintiff’s Motion for a Preliminary Injunction (Docket Entry No. 48), which consists of a memorandum of law (Docket Entry No. 63) and an attorney declaration (Docket Entry No. 64). Docket Entry No. 64 contains five exhibits, including portions of Plaintiff’s pending application for a carry business handgun license (Docket Entry No. 64-1).

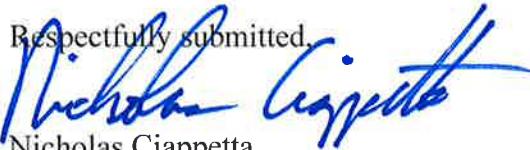
Plaintiff informed me via email following the City Defendants’ filing that he considers information submitted on the application to be sensitive, particularly his prior work history and his business’s cash handling practices. While such information is not required to be redacted pursuant to Federal Rule of Civil Procedure 5.2¹, City Defendants are sensitive to

¹ The document was already redacted by City Defendants to remove Plaintiff’s date of birth, in accordance with the federal rules.

Plaintiff's concerns and, while other information on that page is germane to City Defendants' opposition, the information that Plaintiff is concerned with is not relevant to the instant motion.

Accordingly, City Defendants request that the court either formally seal Docket Entry No. 64-1 or order the removal of Docket Entry 64-1 from the ECF system with a direction to City Defendants to refile a further redacted document omitting the information that Plaintiff deems sensitive.

Thank you in advance for your consideration of this matter.

Respectfully submitted,

Nicholas Ciappetta
Senior Counsel